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(additional counsel for insurers listed on signature page)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

The Roman Catholic Archbishop of San
Francisco,

Debtor and
Debtor in Possession.

Case No. 23-30564 (DM)

Chapter 11

**MOTION OF CERTAIN INSURERS FOR
RELIEF FROM AUTOMATIC STAY TO
PERMIT CALIFORNIA COVERAGE
ACTION TO CONTINUE**

Date: November 30, 2023
Time: 1:30 p.m.
Place: Via ZoomGov

Objection Deadline: November 16, 2023 at
4:00 p.m.

Century Indemnity Company, as successor to CCI Insurance Company and Insurance Company of North America, Pacific Indemnity Company, and Westchester Fire Insurance Company as successor in interest to Industrial Underwriters Insurance Company for policies JU835-8355 and JU895-0964 (collectively, the “**Insurers**”) hereby submit this Motion (the “**Motion**”), pursuant to section 362(d)(1) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 4001 (b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 4004-1 of the Bankruptcy Local Rules for the United States District Court for the Northern District of California (the “**Bankruptcy Local Rules**”) for entry of an order lifting the automatic stay to allow *Century Indemnity Company et al. v. Roman Catholic Archbishop of San Francisco, et al.*, Case No. CGC23607975, in the Superior Court of California, County of San Francisco (the “**California Coverage Action**”), to proceed.

In support of the Motion, the Insurers submit a Memorandum of Points and Authorities and Request for Judicial Notice, filed contemporaneously herewith. For the reasons discussed in the Memorandum of Points and Authorities, the Court should lift the automatic stay to allow the California Coverage Action to proceed.

Respectfully submitted,

Dated: October 27, 2023

/s/ Pierce A. MacConaghy

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